

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re

FIELDWOOD ENERGY LLC, *et al.*¹

Debtors.

Chapter 11

Case No. 20-33948 (MI)

(Jointly Administered)

**CERTIFICATE OF COUNSEL TO PLAN ADMINISTRATOR'S FOURTH OMNIBUS
OBJECTION TO CLAIMS PURSUANT TO SECTION 502(b) OF
THE BANKRUPTCY CODE AND RULE 3007 OF THE FEDERAL RULES OF
BANKRUPTCY PROCEDURE SEEKING TO DISALLOW CERTAIN CLAIMS**

(Related Docket Nos. 2079 & 2197)

The undersigned hereby certifies as follows:

1. On October 6, 2021, the *Plan Administrator's Fourth Omnibus Objection To Claims Pursuant To Section 502(B) Of The Bankruptcy Code And Rule 3007 Of The Federal Rules Of Bankruptcy Procedure Seeking To Disallow Certain Claims* [Docket No. 2079] (the "Fourth Omnibus Objection") was filed with the Court by the administrator of the chapter 11 plan of the above-captioned reorganized debtors.

2. On November 11, 2021, Plan Administrator filed a Certificate of No Objection with respect to the Fourth Omnibus Objection [Docket No. 2193], which attached a proposed form of order with respect thereto (the "Initial Proposed Order").

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors' primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

3. On November 15, 2021, the Court entered an Order at Docket No. 2197, which identified the inclusion of references to “Multi Debtor” claims and “Remaining Claims” in the Initial Proposed Order and the lack of corresponding references thereto in the exhibit attached to the Initial Proposed Order.

4. Attached hereto as **Exhibit 1** is an amended proposed form of order (the “**Revised Proposed Order**”) which revises the references to “Multi Debtor” claims and “Remaining Claims”, in the Initial Proposed Order. A redline reflecting changes from the Initial Proposed Order to the Revised Proposed Order is attached hereto as **Exhibit 2**.

Dated: November 16, 2021

Respectfully submitted,

/s/ Michael D. Warner

Michael D. Warner, Esq.

(TX Bar No. 00792304)

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Counsel for the Plan Administrator

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of November, 2021, a true and correct copy of the above and foregoing has been served by electronic transmission to all registered CM/ECF users appearing in these cases.

/s/ Michael D. Warner

Michael D. Warner, Esq.